

William A. Isaacson (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave. NW, Suite 800
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
Email: wisaacson@bsflp.com

Philip J. Iovieno (admitted *pro hac vice*)
Anne M. Nardacci (admitted *pro hac vice*)
Christopher V. Fenlon (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
10 North Pearl Street, 4th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
Email: piovieno@bsflp.com
anardacci@bsflp.com
cfenlon@bsflp.com

Counsel for Plaintiff
SCHULTZE AGENCY SERVICES, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Master File No. 3:07-md-01827-SI (N.D. Cal.)
Case No. 3:11-cv-03856-SI (N.D. Cal.)
MDL No. 1827

This Document Relates To Individual Case No.
3:11-cv-03856-SI (N.D. Cal.)

SCHULTZE AGENCY SERVICES, LLC on
behalf of TWEETER OPCO, LLC AND
TWEETER NEWCO, LLC

Plaintiff,

vs.

AU OPTRONICS CORPORATION, et al.,

Defendants.

**STIPULATION OF EXTENSION OF
TIME TO RESPOND TO COMPLAINT,
WAIVER OF SERVICE AND
[PROPOSED] ORDER**

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2 WHEREAS, plaintiff Schultze Agency Services, LLC (“Schultze Agency Services”) on
3 behalf of Tweeter Opco, LLC (“Tweeter Opco”) and Tweeter Newco, LLC (“Tweeter Newco”)
4 (collectively “Tweeter”) filed a complaint in the above-captioned case against AU Optronics
5 Corporation, AU Optronics Corporation America, Chi Mei Optoelectronics Corporation, Chi Mei
6 Optoelectronics USA, Inc., CMO Japan Co., Ltd., Epson Electronics America, Inc., Epson
7 Imaging Devices Corporation, HannStar Display Corporation, Hitachi Electronic Devices (USA),
8 Inc., Hitachi, Ltd., Hitachi Displays, Ltd., LG Display Co., Ltd., LG Display America, Inc., Mitsui
9 & Co. (Taiwan), Ltd., Mitsui & Co. (U.S.A.), Inc., NEC Corporation of America, NEC Display
10 Solutions of America, Inc., NEC Electronics America, Inc., Samsung Electronics America, Inc.,
11 Samsung Electronics Co., Inc., Samsung Semiconductor, Inc., Sanyo Consumer Electronics Co.,
12 Ltd., Sharp Corporation, Sharp Electronics Corporation, Tatung Company of America, Inc.,
13 Toshiba America Electronic Components, Inc., Toshiba America Information Systems, Inc.,
14 Toshiba Corporation, and Toshiba Mobile Display Co., Ltd. (collectively, “Stipulating
15 Defendants”) on July 1, 2011 (“Complaint”);

16 WHEREAS, Tweeter wishes to avoid the burden and expense of serving process on the
17 Stipulating Defendants;

18 WHEREAS, the Stipulating Defendants desire a reasonable amount of time to respond to
19 the Complaint; and

20 WHEREAS, Tweeter and the Stipulating Defendants believe that proceeding on a unified
21 response date will create efficiency for the Court and the parties.

22 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
23 undersigned counsel, on behalf of their respective clients, Tweeter, on the one hand, and the
24 Stipulating Defendants, on the other hand, as follows:

25 1. The Stipulating Defendants waive service of the Complaint under Federal Rule of
26 Civil Procedure 4(d). This stipulation does not constitute a waiver by the Stipulating Defendants
27 of any other substantive or procedural defense, including but not limited to the defenses of lack of
28 personal or subject matter jurisdiction and improper venue.

2. The Stipulating Defendants' deadline to move to dismiss, answer, or otherwise respond to the Complaint will be ninety (90) days from the execution of this stipulation, subject to Federal Rule of Civil Procedure 6(a)(1).

DATED: July 22, 2011

/s/ William A. Isaacson
William A. Isaacson (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave. NW, Suite 800
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
Email: wisaacson@bsflp.com

Philip J. Iovieno (admitted *pro hac vice*)
Anne M. Nardacci (admitted *pro hac vice*)
Christopher V. Fenlon (admitted *pro hac vice*)
BOIES, SCHILLER & FLEXNER LLP
10 North Pearl Street, 4th Floor
Albany, NY 12207
Telephone: (518) 434-0600
Facsimile: (518) 434-0665
Email: piovieno@bsflp.com
anardacci@bsflp.com
cfenlon@bsflp.com

Counsel for Plaintiff
Schultze Agency Services, LLC

/s/ Christopher A. Nedeau
Christopher A. Nedeau (CA Bar No. 81297)
Carl L. Blumenstein (CA Bar No. 124158)
Katharine Chao (CA Bar No. 247571)
NOSSAMAN LLP
50 California Street, 34th Floor
San Francisco, California 94111-4799
(415) 398-3600 (Phone)
(415) 398-2438 (Facsimile)
cnedeau@nossaman.com
cblumenstein@nossaman.com
kchao@nossaman.com

Counsel for Defendants AU Optronics Corporation and
AU Optronics Corporation America

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/s/ Neal A. Potischman

Christopher B. Hockett (SBN 121539)

Neal A. Potischman (SBN 254862)

Sandra West (SBN 250389)

Samantha H. Knox (SBN 254427)

Micah G. Block (SBN 270712)

DAVIS POLK & WARDWELL LLP

1600 El Camino Real

Menlo Park, California 94025

(650) 752-2000 / (650) 752-2111

chris.hockett@davispolk.com

neal.potischman@davispolk.com

sandra.west@davispolk.com

samantha.knox@davispolk.com

micah.block@davispolk.com

Jonathan D. Martin (admitted *pro hac vice*)

Bradley R. Hansen (admitted *pro hac vice*)

DAVIS POLK & WARDWELL LLP

450 Lexington Avenue

New York, New York 10017

(212) 450-4000 / (212) 701-5800

jonathan.martin@davispolk.com

bradley.hansen@davispolk.com

*Counsel for Defendants Chimei Innolux Corporation (f/k/a
Chi Mei Optoelectronics Corp.), Chi Mei Optoelectronics
USA, Inc., and CMO Japan Co., Ltd.*

/s/ Stephen P. Freccero

Melvin R. Goldman (CA Bar No. 34097)

Stephen P. Freccero (CA Bar No. 131093)

Derek F. Foran (CA Bar No. 224569)

MORRISON & FOERSTER LLP

425 Market Street

San Francisco, CA 94105-2482

(415) 268-7000 (Phone)

(415) 268-7522 (Facsimile)

mgoldman@mofo.com

sfreccero@mofo.com

dforan@mofo.com

*Counsel for Defendants Epson Electronics America, Inc.
and Epson Imaging Devices Corporation*

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/s/ Ramona M. Emerson

Hugh F. Bangasser (admitted *pro hac vice*)
Ramona M. Emerson (admitted *pro hac vice*)
Christopher M. Wyant (admitted *pro hac vice*)
K&L GATES LLP
925 Fourth Avenue, Suite 2900
Seattle, WA 98104
(206) 623-7580 (Phone)
(206) 370-6371 (Facsimile)
romana.emerson@klgates.com

Counsel for Defendant HannStar Display Corporation

/s/ Kent M. Roger

Kent M. Roger (CA Bar No. 95987)
Herman J. Hoying (CA Bar No. 257495)
MORGAN LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 94105-1126
(415) 442-1000 (Phone)
(415) 442-1001 (Facsimile)
kroger@morganlewis.com
hhoying@morganlewis.com

*Counsel for Defendants Hitachi, Ltd., Hitachi Displays,
Ltd. and Hitachi Electronic Devices (USA), Inc.*

/s/ Michael R. Lazerwitz

Michael R. Lazerwitz, Esq. (admitted *pro hac vice*)
Lee F. Berger, Esq. (CA Bar No. 222756)
CLEARY GOTTlieb STEEN &
HAMILTON LLP
2000 Pennsylvania Avenue, NW
Washington, DC 20006
Telephone: (202) 974-1500
Facsimile: (202) 974-1999
Email: *mlazerwitz@cgsh.com*
lberger@cgsh.com

*Counsel for Defendants LG Display Co. Ltd.
and LG Display America, Inc.*

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/s/ Michael E. Mumford

Paul P. Eyre
Ernest E. Vargo
Michael E. Mumford
BAKER & HOSTETLER LLP
PNC Center
1900 East Ninth Street, Suite 3200
Cleveland, Ohio 44114-3482
(216) 621-0200 (Phone)
(216) 696-0740 (Facsimile)
peyre@bakerlaw.com
evargo@bakerlaw.com
mmumford@bakerlaw.com

*Counsel for Defendant Mitsui & Co. (Taiwan), Ltd. and
Mitsui & Co. (U.S.A.), Inc.*

/s/ George D. Niespolo

George D. Niespolo (CA Bar No. 72107)
Stephen H. Sutro (CA Bar No. 172168)
DUANE MORRIS LLP
1 Market, Spear Tower, Suite 2200
San Francisco, CA 94105-1104
(415) 957-3000 (Phone)
(415) 957-3001 (Facsimile)
gdniespolo@duanemorris.com
shsutro@duanemorris.com

*Counsel for Defendants NEC Corporation of America,
NEC Display Solutions of America, Inc., and NEC
Electronics America, Inc.*

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/s/ Neil K. Roman

Neil K. Roman
Daniel M. Sulieman
Derek Ludwin
Robert D. Wick
COVINGTON & BURLING
1201 Pennsylvania Avenue, N.W.
Washington, DC 20004-2401
212-662-5695
Fax: 212-778-5695
Email: nroman@cov.com
dsuleiman@cov.com
dludwin@cov.com
rwick@cov.com

Simon J. Frankel
Jeffrey Michael Davidson
COVINGTON & BURLING LLP
One Front Street
San Francisco, CA 94111
415-591-6000
Fax: 415-591-6091
Email: sfrankel@cov.com
j davidson@cov.com

*Counsel for Defendants Samsung
Semiconductor, Inc., Samsung Electronics
Co., Ltd., and Samsung Electronics America, Inc.*

/s/ Allison A. Davis

Allison A. Davis (CA Bar No. 139203)
DAVIS WRIGHT TREMAINE LLP
505 Montgomery Street, Suite 800
San Francisco, CA 94111-6533
(415) 276-6500 (Phone)
(415) 276-6599 (Facsimile)
allisondavis@dwt.com

*Counsel for Defendant Sanyo Consumer Electronics Co.,
Ltd.*

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/s/ Jacob R. Sorensen
John M. Grenfell (CA Bar No. 88500)
Jacob R. Sorensen (CA Bar No. 209134)
Fusae Nara (*pro hac vice*)
PILLSBURY WINTHROP SHAW PITTMAN LLP
50 Fremont Street
San Francisco, CA 94105
(415) 983-1000 (Phone)
(415) 983-1200 (Facsimile)
john.grenfell@pillsburylaw.com
jake.sorensen@pillsburylaw.com
fusae.nara@pillsburylaw.com

Counsel for Defendants Sharp Corporation and Sharp Electronics Corporation

/s/ Rachel S. Brass
Rachel S. Brass
GIBSON, DUNN & CRUTCHER LLP
555 Mission Street, Suite 3000
San Francisco, CA 94105-2933
(415) 393-8200 (Phone)
(415) 393-8306 (Facsimile)
rbrass@gibsondunn.com

Counsel for Defendant Tatung Company of America, Inc.

/s/ John H. Chung
John H. Chung
WHITE & CASE LLP
1155 Avenue of the Americas
New York, NY 10036-2787
(212) 819-8200 (Phone)
(212) 354-8113 (Facsimile)
jchung@whitecase.com

Counsel for Defendants Toshiba Corporation, Toshiba America Electronic Components, Inc., Toshiba America Information Systems, Inc., and Toshiba Mobile Display Co., Ltd.

Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from stipulating defendants.

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3 **IT IS SO ORDERED.**
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5 Dated: 8/19/11, 2011
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7 Susan Illston, United States District Judge
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